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ATTORNEY FOR DEBTOR, MICHAEL J. SHEA

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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|------------------|---------------------------------------|
| IN RE: | Case No. 22-15699/MBK |
| MICHEAL J. SHEA, | Chapter 13 |
| DEBTOR. | Judge: Michael B. Kaplan |
| | Hearing Date: Sept. 13, 2022 @ 9:00AM |

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER EXTENDING THE
AUTOMATIC STAY**

TO: Albert Russo
Chapter 13 Standing Trustee
CN 4853
Trenton, NJ 08650

U.S. Trustee
US Dept of Justice
Office of the US Trustee
One Newark Center Ste. 2100
Newark, NJ 07102

Charles G. Wohlrab
Robertson, Anschutz, Schneid, Crane & Partners, PLLC
10700 Abbott's Bridge Road
Suite 170
Duluth, GA 30097

(Counsel for Creditor – Wilmington Trust, NA, successor trustee to Citibank, NA,
as trustee, for the Bear Stearns Asset Backed Securities Trust 2007-SD1, Asset-
Backed Certificates, Series 2007-SD1)

PLEASE TAKE NOTICE that on the 13th day of September 2022, at 9:00AM or as soon thereafter as counsel may be heard, the undersigned attorney for the Debtor will move before the Honorable Michael B. Kaplan at the United State Bankruptcy Court, 402 East State Street, Trenton, New Jersey, for an Order Extending the Automatic Stay.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the undersigned will rely upon the Certification of Debtor, and oral argument of counsel, which Debtor hereby request pursuant to Rule 9013-3(d) of the local rules of bankruptcy practice, in the event opposition to the within motion is filed. Proof of service is annexed hereto and a form of Order Extending the Automatic Stay is submitted herewith in accordance with rule 9013-4 of the local rules of bankruptcy practice.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(a)(3), no legal memorandum is being submitted as the relief requested by the Debtor and basis thereof is fully set forth in the Certification of Debtor's in Support of the within Motion.

PLEASE TAKE FURTHER NOTICE that unless answering papers are filed and served in accordance with Rule 9013-3(d) of the local rules of bankruptcy practice, this motion will be deemed uncontested and the Court, in its discretion may enter an Order in the form filed herewith.

DATED: August 16, 2022

s/Adrian J Johnson, Esq.
ADRIAN J JOHNSON, ESQ.
ATTORNEY FOR DEBTOR